

Michael A. Caddell (SBN 249469)
 mac@caddellchapman.com
 Cynthia B. Chapman (SBN 164471)
 Craig C. Marchiando (SBN 283829)
CADDELL & CHAPMAN
 1331 Lamar, Suite 1070
 Houston TX 77010
 Telephone: (713) 751-0400
 Facsimile: (713) 751-0906

Devin H. Fok (SBN 256599)
THE LAW OFFICES OF DEVIN H. FOK
 P.O. Box 7165
 Alhambra CA 91802-7165
 Telephone: (310) 430-9933
 Facsimile: (323) 563-3445
 devin@devinfoklaw.com

Leonard A. Bennett (*pro hac vice* filed)
CONSUMER LITIGATION ASSOCIATES,
P.C.
 763 J. Clyde Morris Blvd., Suite 1A
 Newport News VA 23606
 Telephone: (757) 930-3660
 Facsimile: (757) 930-3662

Attorneys for Plaintiff

**UNITED STATES DISTRICT COURT
 CENTRAL DISTRICT OF CALIFORNIA
 WESTERN DIVISION**

**GARY L. SMITH, JR., on behalf of
 himself and all others similarly
 situated,**

Plaintiff,

vs.

**HARBOR FREIGHT TOOLS USA,
 INC.,**

Defendant.

No. 2:13-cv-06262-JFW-VBK

**NOTICE OF UNOPPOSED
 MOTION FOR AWARD OF
 ATTORNEYS' FEES, EXPENSES,
 AND CLASS REPRESENTATIVE
 SERVICE AWARD**

Case filed: Aug. 27, 2013
 Hearing date: Jan. 26, 2015 at 1:30 pm
 Hon. John F. Walter

PLEASE TAKE NOTICE that on January 26, 2015, at 1:30 p.m. in Courtroom
 16 of the United States Courthouse, 312 N. Spring St., Los Angeles, California,
 90012-4701, Pursuant to Rule 23 of the Federal Rules of Civil Procedure, Plaintiff

1 Gary L. Smith, Jr. and his Counsel will move the Court for an award of attorneys'
2 fees, expenses of \$367,020, and a Class Representative Service Award of \$2,500 in
3 this case. The bases for these awards are fully set forth in the concurrently filed
4 Memorandum in Support of this Motion.

5 Date: December 18, 2014

Respectfully submitted,

6 By: /s/ Michael A. Caddell
7 Michael A. Caddell (SBN 249469)
8 mac@caddellchapman.com
9 Cynthia B. Chapman (SBN 164471)
10 Craig C. Marchiando (SBN 283829)
11 **CADDELL & CHAPMAN**
12 1331 Lamar, Suite 1070
13 Houston TX 77010
14 Telephone: (713) 751-0400
15 Facsimile: (713) 751-0906

12 Devin H. Fok (SBN 256599)
13 **THE LAW OFFICES OF DEVIN H. FOK**
14 P.O. Box 7165
15 Alhambra CA 91802-7165
16 Telephone: (310) 430-9933
17 Facsimile: (323) 563-3445
18 devin@devinfoklaw.com

16 Leonard A. Bennett (*pro hac vice filed*)
17 Matthew J. Erausquin (SBN 255217)
18 **CONSUMER LITIGATION ASSOCIATES,**
19 **P.C.**
20 763 J. Clyde Morris Blvd., Suite 1A
21 Newport News VA 23601
22 Telephone: (757) 930-3660
23 Facsimile: (757) 930-3662

24 *Attorneys for Plaintiff*

CERTIFICATE OF SERVICE

I hereby certify that on December 18, 2014, I electronically filed the foregoing document with the Clerk of the Court for the Central District of California using the CM/ECF system. The CM/ECF system sent notice of this filing to the following Counsel of Record:

EVAN R. MOSES, CA Bar No. 198099
evan.moses@ogletreedeakins.com
AARON H. COLE, CA Bar No. 236655
aaron.cole@ogletreedeakins.com
OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.
400 South Hope Street, Suite 1200
Los Angeles CA 90071
Telephone: 213.239.9800
Facsimile: 213.239.9045

PATRICK HULLA, *pro hac vice*
patrick.hulla@ogletreedeakins.com
OGLETREE, DEAKINS, NASH,
SMOAK & STEWART, P.C.
4520 Main Street, Suite 400
Kansas City, MO 64111
Telephone: 816.471.1301
Facsimile: 816.471.1303

Attorneys for Defendant
HARBOR FREIGHT TOOLS USA, INC.

/s/ Michael A. Caddell
Michael A. Caddell